

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOB CREATORS NETWORK,

Plaintiff,

v.

OFFICE OF THE COMMISSIONER OF
BASEBALL D/B/A MAJOR LEAGUE
BASEBALL, *et al.*,

Defendants.

No. 1:21-cv-04818-VEC

Judge Valerie E. Caproni

**DECLARATION OF DAVID L. GREENSPAN IN SUPPORT OF DEFENDANTS
MAJOR LEAGUE BASEBALL PLAYERS ASSOCIATION AND TONY CLARK'S
OPPOSITION TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

I, David L. Greenspan, declare:

1. I am an attorney with the law firm Winston & Strawn LLP and am admitted in this Court as one of the attorneys for defendants Major League Baseball Players Association and Tony Clark (collectively, "MLBPA"). If called as a witness, I could and would testify competently to the matters set forth in this declaration.

2. I submit this declaration in support of MLBPA's opposition to Plaintiff's motion for preliminary injunction.

3. Exhibit 1 is a true and correct copy of Article XV(N)(3)(e) of the 2017–2021 Basic Agreement, titled "Mandatory Participation." The Basic Agreement is the collective bargaining agreement between the MLBPA and MLB, governing the working terms and conditions for MLB players. The complete agreement is publicly available at https://d39ba378-ae47-4003-86d3-147e4fa6e51b.filesusr.com/ugd/b0a4c2_95883690627349e0a5203f61b93715b5.pdf.

4. Exhibit 2 is a true and correct copy of Article VII(D) of the 2017 Basic Agreement, titled “All-Star and Home Run Derby Participation Benefits.”

5. Exhibit 3 hereto is a true and correct copy of Job Creators Network (“JCN”)’s tax return for the year 2018.

6. Exhibit 4 hereto is a true and correct copy of JCN’s website purporting to list all of JCN’s current partners. This page is available at: <https://www.jcnf.org/partners/>.

Dated: June 7, 2021

/s/ David L. Greenspan

David L. Greenspan